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Attorneys for Plaintiffs
ARISTA MUSIC, ARISTA RECORDS, LLC,
LAFACE RECORDS LLC, SONY MUSIC
ENTERTAINMENT, SONY MUSIC
ENTERTAINMENT US LATIN LLC, AND
ZOMBA RECORDING, LLC

[Additional Counsel Listed On Signature Pages]

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

ARISTA MUSIC, ARISTA RECORDS, LLC,
LAFACE RECORDS LLC, SONY MUSIC
ENTERTAINMENT, SONY MUSIC
ENTERTAINMENT US LATIN LLC, AND
ZOMBA RECORDING LLC,

Plaintiffs,

v.

RADIONOMY, INC., RADIONOMY SA,
RADIONOMY GROUP, B.V., and
ALEXANDRE SABOUNDJIAN, an
individual,

Defendants.

Case No. 3:16-cv-00951 RS

JOINT STIPULATION AND ~~PROPOSED~~ ORDER REGARDING CONSOLIDATED OPPOSITION BRIEF OF PLAINTIFFS ARISTA MUSIC, ARISTA RECORDS, LLC, LAFACE RECORDS LLC, SONY MUSIC ENTERTAINMENT, SONY MUSIC ENTERTAINMENT US LATIN LLC, AND ZOMBA RECORDING LLC IN RESPONSE TO DEFENDANTS' MOTIONS TO DISMISS

Judge: Hon. Honorable Richard Seeborg
Dept.: Courtroom 3, 17th Floor

Trial Date: None Set

1 The undersigned counsel for Arista Music, Arista Records, LLC, Laface Records LLC,
2 Sony Music Entertainment, Sony Music Entertainment US Latin LLC, and Zomba Recording LLC
3 (collectively, "Plaintiffs") and Defendants Radionomy Inc., Radionomy S.A., specially appearing
4 Defendant Radionomy Group B.V., and specially appearing Defendant Alexandre Saboundjian
5 (collectively, "Defendants") in the above-captioned action hereby stipulate and agree, pursuant to
6 Civil Local Rule 7-12, as follows:

7 WHEREAS, on May 9, 2016, Defendants Radionomy Inc., Radionomy S.A. and
8 Radionomy Group B.V. filed a motion to dismiss pursuant to Fed. R. Civ. P. 12(b)(2) and/or
9 12(b)(6);

10 WHEREAS, on May 9, 2016, Defendant Alexandre Saboundjian filed a motion to dismiss
11 pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(6);

12 WHEREAS, Plaintiffs' responses to Defendants' motions are currently due on May 23,
13 2016;

14 WHEREAS, pursuant to Civil Local Rule 7-3, Plaintiffs may file an opposition of up to
15 twenty-five (25) pages in length of text in response to each of Defendants' motions to dismiss;

16 WHEREAS, Plaintiffs believe that, because of the overlapping facts and arguments raised
17 in Defendants' motions, efficiency will be served by a single, consolidated opposition brief of up
18 to thirty-five (35) pages in length;

19 NOW, THEREFORE, IT IS HERBY STIPULATED by and between Plaintiffs and
20 Defendants, through their respective counsel that:

21 1. Plaintiffs may file a single, consolidated opposition brief in response to Defendants'
22 motions to dismiss of up to thirty-five (35) pages in length of text.

23 **IT IS SO STIPULATED.**

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1 DATED: May 19, 2016

COBLENTZ PATCH DUFFY & BASS LLP

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By: /s/ Jeffrey G. Knowles

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Jeffrey G. Knowles

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Attorneys for Plaintiffs

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ARISTA MUSIC, ARISTA RECORDS, LLC,

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LAFACE RECORDS LLC, SONY MUSIC

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ENTERTAINMENT, SONY MUSIC

9

ENTERTAINMENT US LATIN LLC, ADN

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ZOMBA RECORDING, LLC

11

Dated: May 19, 2016

WEIL, GOTSHAL & MANGES LLP

12

By: /s/ David R. Singh

13

David R. Singh

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BENJAMIN E. MARKS (pro hac vice to be filed)

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to be filed)

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Attorneys for Defendants RADIONOMY, INC.,
RADIONOMY SA, and RADIONOMY GROUP,
B.V.

1 Dated: May 19, 2016

ROPER, MAJESKI, KOHN & BENTLEY

2
3 By: /s/ Todd A. Roberts
Todd A. Roberts

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5 ROPERS, MAJESKI, KOHN & BENTLEY
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Telephone: 650-364-8200
7 Facsimile: 650-780-1701

8 Attorneys for Defendant Alexandre Saboundjian

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10 **ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1**

11 I, Jeffrey Knowles, am the ECF user whose identification and password are being used to
12 file this Joint Stipulation for Extension of Time for Defendants To Respond to Complaint. In
13 compliance with Civil Local Rules 5-1(c)(4) and 5-1(i)(3), I hereby attest that David R. Singh and
14 Todd A. Roberts concurred in this filing.
15

16 Dated: May 19, 2016

/s/ Jeffrey G. Knowles
Jeffrey G. Knowles

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20 **[PROPOSED] ORDER**

21 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

22
23 Dated: 5/20/16

24 
Honorable Richard Seeborg
United States District Judge